

**Arguments/Remarks:**

Applicants thank Examiner Nguyen for the careful examination of this application and the clear explanation of the claim rejections. In response to the Office Action of November 23, 2005, applicants amend this application as follows:

1. Claim 1 is amended to overcome the 102(e) rejection.
2. New claims 19 and 20 are inserted.

**Claim 1**

As amended, claim 1 includes new limitations:

- a. each supporting chip has a protective overcoat layer over a first surface and bond pads covered with bond pad caps; and
- b. metal standoffs having the same thickness as the bond pad caps, disposed on the first surface, contacting the protective overcoat layer to separate the supporting chip from the next successive chip.

Contrarily, in the Her patent, bond pads are not mention in the specification nor depicted in the drawings except to the extend that "wire bonding" is mentioned and that it "is subsequently performed to electrically connect the main chip, the first chip, the second chip to the substrate by wires."<sup>1</sup> Because the Her patent does not disclose bond pad caps and it does not disclose the thickness of the metal standoff being the same as that of the bond pad caps. In additionally, the spacers in the Her patent are not in contact with the protective overcoat. They are separated by the "glue layers."<sup>2</sup> Applicants respectfully submit that the Her patent does not disclose the new limitations and therefore does not anticipate claim 1.

<sup>1</sup> See, e.g. US 6,650,009, col. 1, ll. 63-66.

<sup>2</sup> Ibid. Figs. 3B, 4B, 5, and 6.

Claims 2-18

Claims 2-18 properly depend from claim 1 with additional elements of limitation. Applicants respectfully submit that claims 2-18 stand patentable at least by virtue of their dependence.

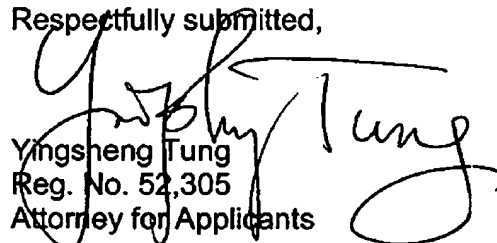
Claims 19 and 20

Claims 19 properly depends from claim 1 and is fully supported in the original specification.<sup>3</sup>

Claim 20 also properly depends from claim 1 and is fully supported in the original specification.<sup>4</sup>

In summary, applicants respectfully submit that as amended, this application is in allowable form and all pending claims 1-20 distinguish over the cited references and stand patentable.

Respectfully submitted,

  
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<sup>3</sup> This application, p. 5, ll. 7-9.

<sup>4</sup> Ibid. p. 6, l. 19 - p.7, l. 2.

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